



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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ATLANTA, GEORGIA 30365

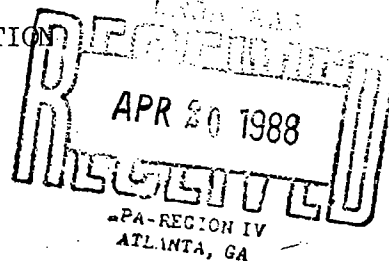
MEMORANDUM

DATE: April 15, 1988

SUBJECT: TRIP REPORT REDSTONE ARSENAL MULTI-MEDIA INSPECTION

FROM: WAYNE MATHIS *W Mathis*

TO: FILE



Wayne Mathis, David Holroyd and Reggie Barrino visited Redstone Arsenal, Alabama on April 7-8, 1988, for the purpose of conducting a multi-media review of U.S. Army environmental programs. The following comments pertain to observations of activities or operations associated with management, handling and past disposal of toxic or hazardous materials or wastes. A list of participants is attached as Attachment I.

Hazardous Waste Management Units at Redstone Arsenal include a RCRA permitted storage facility and several waste accumulation points, some with satellite accumulation points. The facility was last inspected for RCRA compliance in August 1987; no violations were noted by the RCRA inspector at that time. In July 1978 however, an inspection by the Pesticides and Toxics Substances Branch revealed seven violations pertaining to management of PCB's at Redstone Arsenal. A Notice of Violation (NOV) was issued on March 24, 1988. Redstone Arsenal had not yet implemented the recommendations contained therein.

The permitted storage area consisted of 9 igloo buildings originally built for munitions storage, enclosed within a locked security fence, of which 5 igloos were dedicated to storage controlled by the Defense Reutilization and Marketing Office (DRMO) activity which is a tenant activity at Redstone Arsenal. The remaining 4 igloos are used by Redstone Arsenal, and were reported to be empty except for several drums of soil cuttings generated during drilling of monitoring wells. Inspection of the 5 igloos used by DRMO revealed that 2 were used for toxic wastes, 1 for corrosives, 1 for flammables, and 1 for Reactive Wastes (oxidizers). In each igloo inspected there was a concrete ramp at the entrance which prevents liquids from entering or leaving the floor level of the igloo; the concrete floor and walls appear to be tightly bonded to prevent leaks of any spilled liquid, and there was no indication of any leakage or spills. The wastes were on shelves or pallets and were stacked no higher than two drums high. All wastes observed appeared to be properly labelled. Small containers of laboratory reagents or wastes were stored in tubs of vermiculite or in overpacks. Wastes appeared segregated adequately.



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In igloo 86ZZ a large quantity of lead-acid storage batteries destined for recycling by DRMO were banded and palletized. This material was not hazardous waste by virtue of being in the recycling process, and occupied about one half the available corrosive waste storage space. Also located in this igloo was a quantity of outdated medical supplies, which probably would not be classified as corrosive waste.

An inspection of the burning ground revealed that the current operating procedures involve open burning of propellents and propellant contaminated solvents in steel burning pans, and burning of potentially contaminated wood or metal parts on open pads. This appears to be in conformance with currently approved procedures in Subpart X. A project for construction of three additional steel burning pans will increase the capability of handling materials and reduce the quantity of material which is currently retained at the waste accumulation points. The inspector also visited two unlined open burning pits which were formerly used for solvent and propellant burning, and which are presently being studied as potential releases requiring corrective action. The monitoring wells placed for investigation of groundwater contamination at the burning ground were also observed.

A typical propellant forming operation in building 7625 was observed to gain appreciation for the potential for release. With the exception of a sump drain from a vapor degreaser area and an air conditioner cooling tower drain which were connected to the sewer system, the process was basically dry and the potential for waste release was negligible. Housekeeping, as in most explosive/propellant loading operations, was very good. Wastes generated include solvents, solvents contaminated wipers and debris, and propellant contaminated refuse, solvents or scraps. Waste quantities are relatively small, and about three weeks accumulation occupied approximately 4 drums at the waste accumulation point. The potential for any release to the sanitary sewer beyond a de minimus loss is considered extremely unlikely, although possible in a spill situation at the vapor degreaser.

The old post landfill was inspected visually, however no obvious releases were noted.

Finally, the North and South Arsenic Pits were inspected. These sites are closed and filled lagoons where liquid wastes from the manufacture of Lewisite during the 1940's was formerly disposed. They are being investigated for corrective/remedial action at this time.

During the entrance interview, Mathis advised RSA personnel that there was a high probability that RSA would be a candidate for inclusion on the National Priorities List based on preliminary scoring from file data on the burning ground, the arsenic pits, and the old landfill. Mathis recommended that ongoing RI/FS efforts should anticipate data requirement in 40 CFR Part 300, which will be applicable in the event of NPL Listing.

Fedstone Arsenal personnel were briefed on these findings at the conclusion of the inspection.